

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

3M COMPANY,

Plaintiff,

v.

NEXUS MEDICAL LLC,
VINASIA CHE TAO LLC, and
DOES 1-10,

Defendants.

§
§
§
§
§
§
§
§
§

Civil Action No. 1:20-cv-000697-LY

**PLAINTIFF 3M COMPANY’S APPLICATION FOR ENTRY OF DEFAULT AGAINST
DEFENDANT NEXUS MEDICAL LLC**

TO THE HONORABLE CLERK OF THE COURT:

Pursuant to and in accordance with the Federal Rules of Civil Procedure and based upon the Declaration of Plaintiff’s counsel attached hereto as Exhibit A, application is hereby made for the entry of a default against Defendant Nexus Medical LLC (“Defendant”). From a review of the Court file in this case it appears that Defendant was properly served on July 7, 2020 with a copy of the Summons and Complaint in this case. However, Defendant has failed to file an answer or otherwise defend against Plaintiff’s Complaint. A proposed Entry of Default is attached hereto as Exhibit B.

Dated: August 18, 2020

NORTON ROSE FULBRIGHT US LLP

/s/ Michael W. O'Donnell

Michael W. O'Donnell
State Bar No. 24002705
mike.odonnell@nortonrosefulbright.com
Aimeé Vidaurri
State Bar No. 24098550
aimee.vidaurri@nortonrosefulbright.com
Frost Tower
111 W. Houston Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 224-5575
Facsimile: (210) 270-7205

Paul Trahan
State Bar No. 24003075
Paul.trahan@nortonrosefulbright.com
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
Telephone: (512) 536-5288
Facsimile: (512) 536-4598

Attorneys for Plaintiff 3M Company

CERTIFICATE OF SERVICE

On August 18, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court:

Ryan A. Starnes
Libby Sparks Willis Starnes PLLC
5950 Berkshire Lane, Suite 200
Dallas, Texas 75225
rstarnes@libbysparks.com

Attorneys for VinAsia Che Tao LLC

/s/ Michael W. O'Donnell

Michael W. O'Donnell